

Martin S. Bloor
Linda Regis-Hallinan
Thomas G. Haskins, Jr.
LINKLATERS LLP
1345 Avenue of the Americas
New York, NY 10105
212 903 9000 (Tel)
212 903 9100 (Fax)

Attorneys for Defendants

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHADEESHA BROWN and
GABRIEL PEREZ,

Plaintiffs,

v.

THE CITY OF NEW YORK, BRIAN McALEAR,
KEITH HOCKADAY, FEDERICO MARTINEZ,
JOAQUIN MORALES, ROBERT DOWNES,
THOMAS ALBANO, GERARD FLOOD,
WILLIAM HART, TIMOTHY MURPHY,
KENYETTA ROUSE, and THOMAS LONGA,

Defendants.
-----x

11 CV 1068 (AJN)

**Defendants' Response to Plaintiffs'
Additional Relevant Facts**

Defendants City of New York, Brian McAlear, Keith Hockaday, Frederico Martinez, Joaquin Morales, Robert Downes, Thomas Albano, Gerard Flood, William Hart, Timothy Murphy,¹ Kenyatta Rouse, and Thomas Longa (together "Defendants"), by their attorneys, Linklaters LLP, submit the following statement in response to Plaintiffs' Additional Relevant Facts ("Plaintiffs' Statement"), filed in conjunction with Plaintiffs' Opposition to Defendants' Motion for Summary Judgment. (ECF No. 47).

¹ Defendant's name is incorrectly stated in the Complaint. Defendant's name is Thomas Murphy, not Timothy Murphy.

Plaintiffs' Statement is not in accordance with Rule 56.1 of the Local Civil Rules for the Southern District of New York, as it does not set forth facts to which Plaintiffs' contend there *does* exist a genuine issue to be tried as required by the Rule. Further, none of the assertions listed in Plaintiffs' Statement are material to the determination of Defendants' Motion for Summary Judgment. Defendants reserve the right to respond to each of the assertions in Plaintiffs' Statement if so required by the Court.

Dated: New York, New York
September 28, 2012

Respectfully submitted,

Linklaters LLP

By: /s/ Martin S. Bloor

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Linda Regis-Hallinan

Thomas G. Haskins, Jr.

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